

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA
PITTSBURGH DIVISION**

R. CATHY REARDON)	
On behalf of herself and all)	
similarly situated individuals,)	
)	
Plaintiffs,)	Civil Action No. 2:08-cv-1730MRK
v.)	
CLOSETMAID CORPORATION,)	Hon. Judge Mark R. Hornak
)	
Defendant.)	Class Action

PLAINTIFF’S OMNIBUS MOTION *IN LIMINE*

The Plaintiff, R. Cathy Reardon, on behalf of herself and the class, moves *in limine* to preclude the Defendant ClosetMaid Corporation (“ClosetMaid”) from offering evidence or argument at trial concerning the following matters:

1. That because Ms. Reardon signed two different Disclosure forms, the forms were "clear and conspicuous" as required by the FCRA. ClosetMaid should be precluded from arguing that one form signed by Ms. Reardon is a "disclosure" and the other is an "authorization."
2. Any evidence or argument that Reardon or class members "knew" that a consumer report would be pulled.
3. Any argument that Ms. Reardon or the Class have a burden or need to show any form of actual damages or concerning the fact that Plaintiff Reardon and the Class are not pursuing a claim for actual damages.

In support of this motion, Plaintiff submits the following Memorandum of Law, which is incorporated by reference herein.

Respectfully submitted,

By: s/ James M. Pietz

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*Counsel for the Representative And
Class Plaintiff*

CERTIFICATE OF SERVICE

I hereby certify that, on this 27th day of November, 2013, I caused a true and correct copy of Plaintiff's Omnibus Motion *In Limine* to be served by way of ECF Notification upon the following counsel of record for the Defendant:

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